

HORIZON
CABLE TV INC.

June 11, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

RECEIVED

JUN 14 1993

FCC MAIL ROOM

RECEIVED

JUN 14 1993

PETITION FOR STAY IN MM DOCKET 92-266

Dear Ms. Searcy:

As an operator of four small cable systems with a total of 2,300 subscribers in three separate franchise areas, I am hereby requesting that at a minimum you delay the effective date of the Commission's rate regulations until your staff has worked out problems with the benchmark worksheets and issued a ruling on requirements for cost-of-service showings.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I understand the time constraints the FCC has been working under to implement the 1992 Cable Act and appreciate the willingness expressed by FCC staff members this week at the National Cable Convention in San Francisco to formulate answers for our many questions and fine-tune the benchmark tables and worksheets with respect to small operators.

Like the FCC, we are finding it very difficult to meet the many deadlines and tight timetables set up. With just five employees we are kept very busy maintaining our four systems and running our business. We are finding that we cannot afford the additional manpower and expertise necessary to implement all aspects of the Act.

Despite our very similar situation, we did not have the economic or legal resources to obtain a stay of the "must-carry" provisions as did Viacom in our area. We had no choice but to implement some very unpopular and costly changes on June 2, 1993. And, now, with just a week to go we are unable to make informed decisions on how to comply with the Commission's rate regulations. Our accounting

Ms. Donna R. Searcy
June 11, 1993
Page 2

As a small operator with much higher costs of doing business and limited alternative sources for revenue we have some very difficult decisions ahead of us. Do we change our billing system, comply with the benchmark rates and unbundling requirements and violate our bank covenants? Or, do we attempt a cost-of-service showing? How do we do that? What will it cost? What will the requirements be?

These new rules and regulations are extremely burdensome economically and administratively for a company our size. We need your consideration! I do not believe it was the intent of Congress or that of the FCC's to put small cable companies around this country out of business. Please stay the implementation of the Commission's rate regulations until you fully take into account the effects on small operators and are able to properly implement and answer all questions on these new rules.

Sincerely,



Susan M. Daniel

cc: Representative Lynn Woolsey
Senator Diane Feinstein
Senator Barbara Boxer
Small Cable Business Association